

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**CHRISTINE REEVES, also known as
CHRISTINE NEWMAN,**

and

VCARE USA LLC,

Defendants.

I, DAVID DICKIE, declare as follows:

1. I am 49 years old and I reside in San Antonio, Texas. I have learned that in 2017 and early 2018, my father, Kenneth Dickie, became the victim of a fraudulent technology-support scheme. He was a physician and died in December 2018.
2. In early January 2018, my father was hospitalized in Nuevo Vallarta, Mexico while on vacation with my mother, Ruth Dickie. On January 24, 2018, my mother signed power of attorney to me, to pay their bills, while remaining in Mexico to take care of my father.
3. Once I began managing my father's finances, I noticed a series of at least thirty strange transactions that began taking place in June 2017 to January 2018. These transactions ranged in amount from \$15 wire-transaction fees up to wires of \$5,000. Christine Reeves and VCare USA LLC were among the recipients of these transactions; others were Hites Technologies, Itess Global LLC, Itess Technologies Pvt. Ltd., Click IT Solution, and someone named Pratap Bhanu. Neither my mother nor I was familiar with any of these people or

companies, and neither of us knew why tens of thousands of dollars were sent to them from my father's account. Shortly after discovering the suspicious payments, I submitted a fraud notice to Wells Fargo.

4. At around the same time that I submitted the fraud notice to Wells Fargo, my mother and I learned that my father had been receiving urgent phone calls about computer technical services; my mother found several voicemail messages on my father's phone. The messages all relayed a similar message—that my father's computer had been hacked and that my father would need to pay for technical-support services to clean-up the network from these alleged hackers. Even during my father's incapacitation and hospitalization in Mexico, he was receiving these calls and voicemail messages every day.

5. A Wells Fargo bank representative informed me that, the first time my father made one of these payments, my father had actually come into the bank and signed to authorize a wire transfer. It is unclear if the subsequent payments required my father's presence or whether the first access provided an open window into my father's bank account for easy withdrawals.

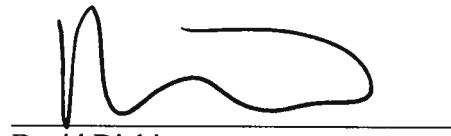
6. My father was a doctor. Under normal circumstances, there was no way that he would have paid multiple thousands of dollars, even once, for technical services for his personal computer. He absolutely would not have paid the same people dozens of times for tens of thousands of dollars for such services. However, my father was induced to make these payments after he contracted Parkinson's disease. My mother and I were not aware of the extent of his mental state until after he got sick in Mexico. After his illness in Mexico rendered him speechless, he was either unable to communicate about the transactions, or had no memory of them. The bank records show that from June 5, 2017 to January 2, 2018, my father paid at least

\$84,499.98 to Christine Reeves and VCare USA LLC and various individuals and "companies" associated with them.

7. My father was still receiving calls claiming his computer was infected and needed immediate technical attention until he passed away last December.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 27, 2019



David Dickie

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2 CERTIFICATE OF SERVICE
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5 The undersigned hereby certifies that he is an employee in the Office of the United
6 States Attorney for the Western District of Washington and is the person of such age and
7 discretion as to be competent to serve papers;

8 It is further certified that on this day, I mailed by United States Postal Service said
9 pleading to Defendants, addressed as follows:

10 Christine Reeves
11 VCare USA LLC
12 15606 Goldbar Dr.
13 Gold Bar, WA 98251-9572

14 Dated this 7th day of March, 2019.

15 _____
16 /s/ *Thomas Everett* _____
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